

March 24, 1981

Dear Manufacturer:

Enclosed is a March 10, 1981 letter from Thomas M. Fisher of General Motors (GM) and Michael P. Walsh's response dated March 17, 1981 concerning approval of "SF" multigrade fuel-efficient engine oils in GM's 1982 model year emission certification and fuel economy vehicles. These letters are being made publicly available as an illustration of one way to satisfy the criteria laid out by EPA's policy memorandum of January 16, 1978 (E. O. Stork to C. H. Heinen, Chrysler Corporation, and made generally available to the industry) on use of fuel-efficient oils.

Sincerely,

Robert E. Maxwell, Director,
Certification Division

Enclosures

Mr. Thomas M. Fisher, Director
Automotive Emission Control
Environmental Activities Staff
General Motors Corporation
General Motors Technical Center
Warren, Michigan 48090

Dear Mr. Fisher:

Your March 10, 1981, request for approval for use of "SF" multigrade fuel-efficient engine oils in your 1982 emission certification and fuel economy vehicles is granted provided that:

1. You adhere to your proposed procedure of selecting an oil which has ASTM-measured fuel economy improvements not greater than the current sales-weighted improvements of the SF multigrade oils available to your customers.
2. You select an oil competitively priced with the majority of SF multigrade oils on the market (for example, you should use the Pennzoil oil that you referenced in your letter or a similarly priced oil).
3. You restrict your selection to an oil having a mineral oil base stock since the showing of representativeness that you have made in all of your data submissions to us have not indicated that a synthetic oil is representative of what your consumers are likely to use based on oils currently available in the marketplace.
4. You continue to recommend use of only multigrade SF (or SF/CC) fuel-efficient oils to your consumers.
5. You use a multigrade SF or SF/CC oil for factory fill that is statistically the same or better than the oil used for emission certification and fuel economy vehicles in terms of ASTM-measured fuel economy improvements.

This approval is granted because we believe you have made a satisfactory showing of representativeness under the criteria laid out by EPA's policy memorandum of January 16, 1978 (E. O. Stork to C. H. Heinen, Chrysler Corporation, and made generally available to the industry). Although we do not yet have a generic definition of fuel-efficient oils, your showing that essentially all SF multigrade oils are, or will be, fuel efficient (as measured by the ASTM procedure) in time for the 1982 model year is reasonable so long as you follow the procedure of selecting

an oil representative of the "SF multigrade class" of oils (i.e., the sales-weighted proposal--item No. 1 above).

--2--

Also, a critical condition to this approval is that you recommend only SF fuel-efficient oils to your customers since you have made no showing that SE oils are likely to be fuel efficient. If you were to additionally recommend use of SE grade oils, there would be no assurance that your consumers would typically use fuel-efficient oils.

We do not wish to establish excessive new reporting burdens in this area. The only new items to be included that are not already specified in the application format are identification of the brand/product name of the oil used in your data cars, including a brief statement of compliance with the five conditions of this approval. You should document and have available for EPA audit the basis for your estimate of the representative (i.e., sales-weighted) percentage fuel economy improvement of the SF oils on the market and your basis for concluding that the oil you have selected does not have ASTM-measured fuel economy improvements greater than this average.

This letter and your letter of March 10, 1981, will be made publicly available as an illustration of one way to satisfy the criteria set by EPA in the above-referenced policy memorandum of January 16, 1978, on use of fuel efficient oils.

Sincerely yours,

Michael P. Walsh
Deputy Assistant Administrator
for Mobile Source Air Pollution Control (ANR-455)

cc: C. Gray
R. Maxwell

FE: 2407

GM logo

Environmental Activities staff
General Motors Corporation
General Motors Technical Center
Warren, Michigan 48090

March 10, 1981

Mr. Michael P. Walsh
Deputy Assistant Administrator
Mobile Source Air Pollution Control AW-455
EPA Office of Air Programs
Waterside Mall-Room 741 West Tower
401 M Street, S.W.
Washington, D. C. 20460

Dear Mr. Walsh:

Fuel Efficient Engine Oils

General Motors hereby petitions for approval of "SF" multigrade fuel efficient engine oils in our 1982 emission certification and fuel economy vehicles on the primary basis that the four criteria stated in Mr. E. O. Stork's letter of January 16, 1978 have been satisfied.

First Criterion

"A generic means of defining such oils, so that reference could be made to them as a class rather than (as is now the case) only in terms of brand names;"

We submit that the generic requirement has been satisfied by the ASTM boundaries now being self-imposed by the oil suppliers. EPA has been furnished information that shows that almost all the fuel saving engine oil claims by the major suppliers are currently being made on the basis of a uniform testing procedure. Several suppliers have voluntarily made these test data available to EPA. In addition, EPA has been given documentation that the majority of "SF" multi-grade engine oils on the market are already labeled as fuel efficient. Hence although one exists, no classifying system is really needed to assist the customer in finding these oils.

Second Criterion

"General availability of such oils in normal retail channels;"

--2--

All major oil companies currently market fuel saving engine oils. In terms of the multigrade type oils we recommend to our customers, over 60 percent are currently fuel saving with this percentage projected to increase another 10 to 15 percent in the next several months. We are advised that essentially all new "SF"-quality engine oil formulations are intended to be fuel saving.

Third Criterion

"Retail prices for such oils sufficiently near the retail prices for currently used top-grade oils so as to make it likely that the generically-defined synthetic or modified oils will actually be used;"

We believe your Ann Arbor staff is satisfied this criterion has been met. Pennzoil, the second largest supplier of branded motor oils, currently advertises that its fuel efficient oil claims are based on proposed ASTM measurement procedures and that the new fuel efficient oil is available at no increase in price.

Fourth Criterion

"Recommendations by manufacturers in owners manuals regarding the use of such oils and, if the retail cost of such oils is higher than the retail cost of other top-grade oils, possibly the conditioning of the manufacturer's warranty on the use of the generically-defined synthetic or modified oils."

General Motors currently meets this criterion in our 1981 owners manuals and will again for our 1982 models. We do not specifically condition the warranty to fuel-efficient oils; however, we recommend the use of multigrade "SF" or "SF/CC" oils and encourage our customers to select those brands having associated fuel saving claims.

In addition to the above EPA criteria, General Motors intends to self-impose additional guidelines to insure that we use oils in our 1982 data fleet that represent (to the best of our ability to discern) what our customers will use, particularly in terms of potential fuel economy improvement. Based on current ASTM information available from the major oil suppliers and the

ASTM formal program, we project that the current sales-weighted improvement for our customers is approximately 1.8 percent. (Anything less than 1.0 percent would not be considered fuel saving). Our basis for the 1.8 percent average will be documented and available for EPA audit. Therefore, General Motors intends to select only those fuel saving oils for our 1982 data fleet having ASTM measured fuel economy improvements not statistically greater than 1.8 percent.

We believe this self-imposed guideline along with the foregoing verification of Mr. E. O. Stork's criteria demonstrates General Motors good faith effort in assuring the representativity of our certification effort. We ask that you act on this request most expeditiously since our 1982 data fleet builds are already in process.

Sincerely

T. M. Fisher, Director
Automotive Emission Control

9SJS/309

cc: Charles Gray
Robert Maxwell